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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION
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12 SHANGHAI 1930 RESTAURANT
PARTNERS, LP, on behalf of itself and all
13 others similarly situated,

14 Plaintiff,

15 v.

INTEL CORPORATION, a Delaware
16 corporation,

17 Defendant.
18

No. C-05-2830-MHP

**STIPULATION AND ~~PROPOSED~~
ORDER TO STAY DATES, EVENTS
AND DEADLINES PENDING THE
OUTCOME OF THE MOTION TO
TRANSFER AND COORDINATE OR
CONSOLIDATE PURSUANT TO
28 U.S.C. § 1407**

19 WHEREAS, on July 12, 2005, Plaintiff filed the instant action in the Northern
20 District of California ("Shanghai Action");

21 WHEREAS, on or about July 11, 2005, the plaintiffs in *Brauch, et al. v. Intel*
22 *Corp.*, No. C 05-2743 (BZ) (N. D. Cal., filed July 5, 2005), a related matter, moved before the
23 Judicial Panel on Multi-District Litigation ("MDL"), to transfer and coordinate or consolidate for
24 pre-trial proceedings pursuant to 28 U.S.C. § 407 ("MDL Motion"), and the Shanghai Action has
25 been identified as a related action subject to that motion;
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1 WHEREAS, on or about July 27, 2005, Judge Patel issued a Related Case Order
 2 relating this case to an earlier filed case assigned to her, and canceling or staying certain but not
 3 all dates, events and deadlines in the action;

4 WHEREAS, to date, a decision has not been rendered on the MDL Motion;

5 WHEREAS, the outcome of the MDL Motion will impact significantly the
 6 schedule of this case;

7 THEREFORE, IT IS HEREBY STIPULATED, pursuant to Civil Local Rule 6-2,
 8 by and among counsel for Plaintiff Shanghai 1930 Restaurant, and counsel for Defendant Intel
 9 Corporation, that any events, dates or deadlines set by the Local Rules or Federal Rules of Civil
 10 Procedure, including the Local Rules for Alternative Dispute Resolution ("ADR Local Rules")
 11 and Federal Rules of Civil Procedure 16 and 26, and any deadlines established in any case
 12 management order applicable to this case should be stayed pending the outcome of the
 13 aforementioned MDL Motion; and

14 IT IS FURTHER STIPULATED by the aforementioned parties that if a case
 15 management conference is rescheduled by the Court, the parties shall adjust the dates for any
 16 conference, disclosures or reports required by the Local Rules or Federal Rules of Civil
 17 Procedure, including the ADR Local Rules and Federal Rules of Civil Procedure 16 and 26
 18 accordingly.

19 IT IS HEREBY STIPULATED.

20 Dated: October 28, 2005

SAVERI & SAVERI

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22 By: /s/ R. Alexander Saveri
 23 R. Alexander Saveri
 Attorneys for Plaintiff
 Shanghai 1930 Restaurant Partners, LP

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1 Dated: October 28, 2005

BINGHAM McCUTCHEN LLP

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By: /s/ Joy K. Fuyuno
Joy K. Fuyuno
Attorneys for Defendant
Intel Corporation

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**~~[PROPOSED]~~ ORDER TO STAY DATES, EVENTS AND DEADLINES
PENDING THE OUTCOME OF THE MDL MOTION**

Any events, dates or deadlines set by the Local Rules or Federal Rules of Civil Procedure, including the Local Rules for Alternative Dispute Resolution ("ADR Local Rules") and Federal Rules of Civil Procedure 16 and 26, and any deadlines established in any case management order applicable to this case are hereby stayed pending the outcome of the motion to transfer and coordinate or consolidate pursuant to 28 U.S.C. § 1407 ("MDL Motion").

Upon the determination of the MDL Motion, if it is necessary for the Court to reschedule a case management conference, the parties shall adjust the dates for any conference, disclosures or reports required by the ADR Local Rules and Federal Rules of Civil Procedure 16 and 26 accordingly.

The parties shall notify the Clerk of Court within 10 days of the decision on the MDL Motion.

IT IS SO ORDERED.

Dated: _____



Honorable Marilyn H. Patel
United States District Court Judge